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Walmart Inc. and Jetson Electric Bikes, LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

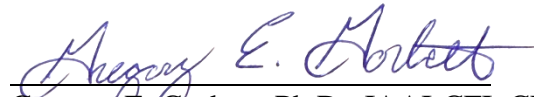|	
STEPHANIE WADSWORTH)	
Individually and as Parent and Legal Guardian)	
of W.W., K.W., G.W., and L.W., minor children)	
and MATTHEW WADSWORTH,)	
)	Case No. 2:23-cv-00118-NDF
Plaintiffs,)	
)	**DECLARATION OF**
v.)	**GREGORY E. GORBETT**
)	**IN SUPPORT OF RESPONSE**
WALMART INC. and)	**MEMORANDUM IN**
JETSON ELECTRIC BIKES, LLC,)	**OPPOSITION TO PLAINTIFFS'**
)	**MOTION TO EXCLUDE**
Defendants.)	**EXPERT TESTIMONY**
)	

I, Gregory E. Gorbett, state as follows:

1.   I am an expert in Computational Fluid Dynamics fire modeling.

2.   I was retained as an expert by McCoy Leavitt Laskey LLC on behalf of Defendants, Jetson Electric Bikes, LLC and Walmart Inc.

3.   This case involves a February 1, 2022 residential fire in Green River, Wyoming.

4.   I prepared an expert report dated September 9, 2024, opining on two competing fire origin hypotheses presented in this case to determine which one, if either, the fire dynamics computer modeling supported.

5.   The software that I used for the modeling is called Fire Dynamics Simulator ("FDS"), version 6.9, and its accompanying visualization software, Smokeview. Both of these are produced by the National Institute of Standards and Technology ("NIST").

6.   Attached as Exhibit 1 is a true and correct copy of NIST Special Publication 1018-3 (6th Ed) Fire Dynamics Simulator Technical Reference Guide Volume 3: Validation. This 1,200+ page guide describes the lengthy and detailed validation process that NIST went through to validate the FDS software.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: December 16, 2024

Gregory E. Gorbett, Ph.D., IAAI-CFI, CFEI, CFII, CFPS, CVFI